ATTACHMENT 1

CWA COMPLIANCE EVALUATION INSPECTION REPORT
U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 5

Purpose:
Compliance Evaluation Sampling Inspection

Facility:
Ex. 6 (Personal Privacy) Farms
Ex. 6 (Personal Privacy)

NPDES Permit Number:
N/A

Date of Inspection:
November 6, 2013

EPA Representatives:
Ben Atkinson, Agronomist (312)-353-8243
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Cheryl Burdett, Life Scientist (312)-886-1463
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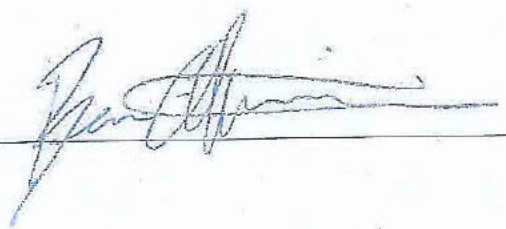
State Representatives:
None

Facility Representatives:
Ex. 6 (Personal Privacy) FOIA Exemption (b) (6)
Ex. 6 (Personal Privacy)

Report Prepared by:
Ben Atkinson, Agronomist

Report Date:
09/15/2014

Inspector Signature 

Which information does the facility consider to be CBI?	None identified

Table 3: Facility Description

Type of Animal	**Number of Animals**	**Capacity**	**Type of Confinement**
Mature Dairy Cows	230	230	Total Confinement
Minimum Number of Animals since date of operation:			50
Maximum Number of Animals in previous 5 years:			230±
Number of Animals that are stabled/confined and/or fed/maintained for 45 days or more in previous 12 months:			Approximately 230
Amount of Liquid Manure Generated per year:			Unknown
Amount of Solid Manure Generated per year:			Unknown
(Illinois Only) Name of Certified Livestock Manager for facility: (if 300 animal units or greater):			NA
(Illinois Only) If 1000 < AU < 5000 is a general waste management plan maintained at the facility?			NA
(Illinois Only) If AU > 5000 has a general waste management plan been submitted to the IDOA?			NA
Does the facility have an NPDES Permit?			No
SIC or NAICS code:			0241
Date Defined as CAFO (If a defined CAFO)			11/6/2013
Reason Defined as CAFO(If a defined CAFO)			200+ animals and discharge
Do animals have direct access to Waters of the United States?			No
Are crops, vegetation, forage growth, or post-harvest residues sustained in the normal growing season over any portion of the lot or facility where animals are kept?			No
What is the area (acres) of the production area?			5
What is the area (acres) of the pasture?			None
How many employees (not counting family members)?			2
Other facilities under common ownership (name and address):			
None			

Table 4: Livestock Waste Storage

Type of Storage	Storage Capacity	Type of Liner	Depth Markers Present	Last Time Waste was Removed	Amount of Waste Removed	Days of Storage
Manure Pit	120000 Gal	Concrete	No	Within the week before the inspection	Unknown	40
Transfer pit	12000 Gal	Concrete	No			

Records at site of storage structure design?	No
Is manure stored for the short term? If yes, describe where it is stored, how it is drained and where it drains to.	No
Are records kept of the level of manure in the storage structures?	No
When was the last time a storage structure was emptied, either partially or completely?	Manure pit was partially emptied within the 7 days prior to the inspection
What amount of manure or process wastewater was removed the last time the storage structure was emptied, either partially or completely?	unknown
Do the facility personnel inspect and keep records of all diversion devices?	Inspect but no records
Do the facility personnel inspect and keep records of all impoundments?	Inspect but no records
Do the facility personnel inspect and keep records of all the water lines?	Inspect but no records
Do the facility personnel perform routine visual inspections and keep records of the production area?	Inspect but no records
Does the waste storage system have a managed outfall or discharge point? If yes, provide a description of the outfall and a description of the area receiving the discharge.	No
Has the facility had any documented discharges of livestock waste to surface water in the past year?	No
Are there safety devices installed around any manure storage ponds? (Barriers at the	No

end of manure push off platforms, fences around pond, signage.)	
Additional Information:	

Table 5: Livestock Waste Management

Describe the way manure is collected and disposed of at the facility:	
Manure from Building 2 is pushed to the transfer pit and then pumped to the manure pit. Buildings 1 and 3 are manually scraped and put into the manure pit.	
Describe the way used bedding is collected and disposed of at the facility:	
Bedding is handled with the rest of the manure	
Are mortality records kept?	Yes
Describe the way mortalities are managed at the facility:	
Mortalities are picked up by Sandy Bay Mink farm.	
What type of method is used to provide drinking water for the animals?	Float waterers
Describe the way spilled drinking water is collected and disposed of at the facility:	
Collected with manure.	
Describe the way mist cooling water is collected and disposed of at the facility:	
No mist cooling is used.	
Describe how chemicals are stored and how used or spilled chemicals are collected and disposed of at the facility:	
Chemicals are stored in the utility room attached to Building 1.	
Describe the way water that has been used to wash/flush barns is collected and disposed of at the facility:	
All cleaning water is disposed of with the manure.	
Describe where water comes from that is used to clean and/or flush. (Wells, city, etc.)	
Wells	
Describe the way feed is contained and how runoff from feed is collected and disposed of at the facility:	
Feed is stored in feed bunkers and silage bags on the facility. There is no runoff collection.	

If a dairy, describe how process wastewater from the plate cooler water is collected and disposed of at the facility:	
Plate cooler water is used to water animals.	
If a dairy, describe how process wastewater from the cleaning of the milking parlor is collected and disposed of at the facility:	
Process wastewater from the cleaning of the milking parlor is collected and disposed of with the manure.	
If a dairy, describe how process wastewater from the cleaning of the milk tanks is disposed of at the facility:	
Process wastewater from the cleaning of the milk tanks is disposed of with the manure.	
If a dairy, how many times per day are cows milked?	Twice

Table 6: Land Application and Disposal of Manure and Process Wastewater

Does the facility perform and keep records of the manure testing?	Yes
When was the last time a sample was taken of the manure and/or process wastewater?	In the spring of 2013
Describe the process to take the manure and/or process wastewater sample.	Manure is agitated and samples are taken from the spreaders.
Number of acres available for land application:	Unknown
Are land application records kept?	Yes
Who applies the manure and process wastewater to the fields?	Operator
Are weather conditions at time of application kept? (24 before – 24 after)	Unknown
Does the facility perform and keep records of the soil testing?	Yes
Is manure transferred off-site to another party?	No
Are manure transfer records maintained?	NA
Do facility personnel perform periodic inspection of land application equipment?	Yes

Table 7: Receiving Surface Waters

Describe the surface flow pathways:	
The runoff from the facility flows into the immediately adjacent unnamed intermittent tributary. The unnamed intermittent tributary flows approximately 2.6 miles to a connector at County Road JJ which is not mapped on the National Hydrography Dataset (NHD). The connector flows 1 mile from County Road JJ to the unnamed intermittent tributary at Townline Road. The unnamed intermittent tributary flows approximately .4 miles from Townline Road to the intermittent Baird Creek. Intermittent Baird Creek flows approximately 6 miles to become perennial Baird Creek. Perennial Baird Creek then flows approximately 3.9 miles to the perennial East River. The East River flows approximately1.8 miles to the perennial Fox River. The Fox River flows approximately 1.3 miles to Lake Michigan.	
How many months out of the year is there flow in the nearest surface water pathway:	According to operator, the stream flows periodically all year depending on rain.
Are there any storm water pathways entering the facility?	Yes
Are there any clean water ponds on site?	No
What is the name of the first waterway that is identified as Traditional Navigable Water (TNW) for surface flow from the facility?	Lake Michigan
Is the surface water pathway nearest to the facility considered to be ephemeral, intermittent or perennial?	Intermittent
Is the surface water pathway nearest to the facility considered to be impaired?	The East River is listed on the 303D list as impaired for Aquatic Toxicity, Degraded Habitat, Dissolved Oxygen, Metals (other than Mercury), Phosphorus, and Sediment. The Fox River is listed on the 303D list as impaired for Dissolved Oxygen, Fish Consumption Advisory – PCBs, and Phosphorous.

Table 8: Nutrient Management Plan

NMP on site?	No, being updated.
Additional NMP comments:	The operation did have an NMP and the NMP writer was on-site to speak with EPA. The facility is a medium facility without a permit and so is not required to have an NMP.
Does the NMP reflect the current operational characteristics?	Per operator, yes.

Table 9: Facility Records (details of the records reviewed)

Notes	No records were available to review.

Table 10: NPDES Permit

Notes	No NPDES Permit.

2.2 Walkthrough of the Facility

Note: Some photos have been placed non-chronologically in order to better describe areas of interest. These photos are duplicated at the appropriate chronological location in the narrative. Additionally, photos DSCF001 - DSCF003 were taken with the lens cap on and blank. Photos DSCF0025 - DSCF0029 were mistakenly taken as video and are unusable.

EPA inspectors Ben Atkinson and Cheryl Burdett (inspectors) arrived at the operation at 9:25 A.M. on November 6, 2013. After donning protective yellow booties, Mr. Atkinson approached an employee and presented his credentials. Mr. Atkinson explained the purpose of the inspection and asked if there was a facility representative who could give permission to conduct the inspection and answer questions. The employee gave Mr. Atkinson the phone number for [redacted] (the operator). Mr. Atkinson called the operator and explained the purpose of the inspections and asked if someone was available to answer questions regarding the facility. The operator stated that he would like to have other people with him during the inspection and he would have to find out if they were available. The operator called Mr. Atkinson back a few minutes later and explained that he was having his nutrient management plan writer come to be present during the inspection but that he would not be available for an hour and stated that he preferred that the EPA not wait on-site. The EPA agreed to leave and return an hour later. The inspectors removed their yellow booties and left the facility. The operator called at approximately 10:00 A.M. to confirm that he would be ready to meet at 10:30 A.M. The inspectors returned to the facility at 10:30 A.M. The inspectors donned protective booties and confirmed that the location where they parked their vehicle was acceptable. They then presented their credentials to the operator. The operator was joined by his Independent Crop Consultant, Nathen Nysse. The NRCS District Conservationist, John Malvitz, was also present. Mr. Malvitz stated that he was not staying for the inspection but wanted to introduce himself. After Mr. Malvitz left, the inspectors explained the purpose and format of the inspection. The operator's consultant questioned whether the inspection would look at specific areas of concern that had been previously identified by EPA. The inspectors explained that the inspection would include the entire production area. The facility walkthrough began on the northeast corner of the facility. The inspectors along with the operator and his consultant walked east on the north side Building 1. The inspection then turned south and walked along the east side of Building 2.

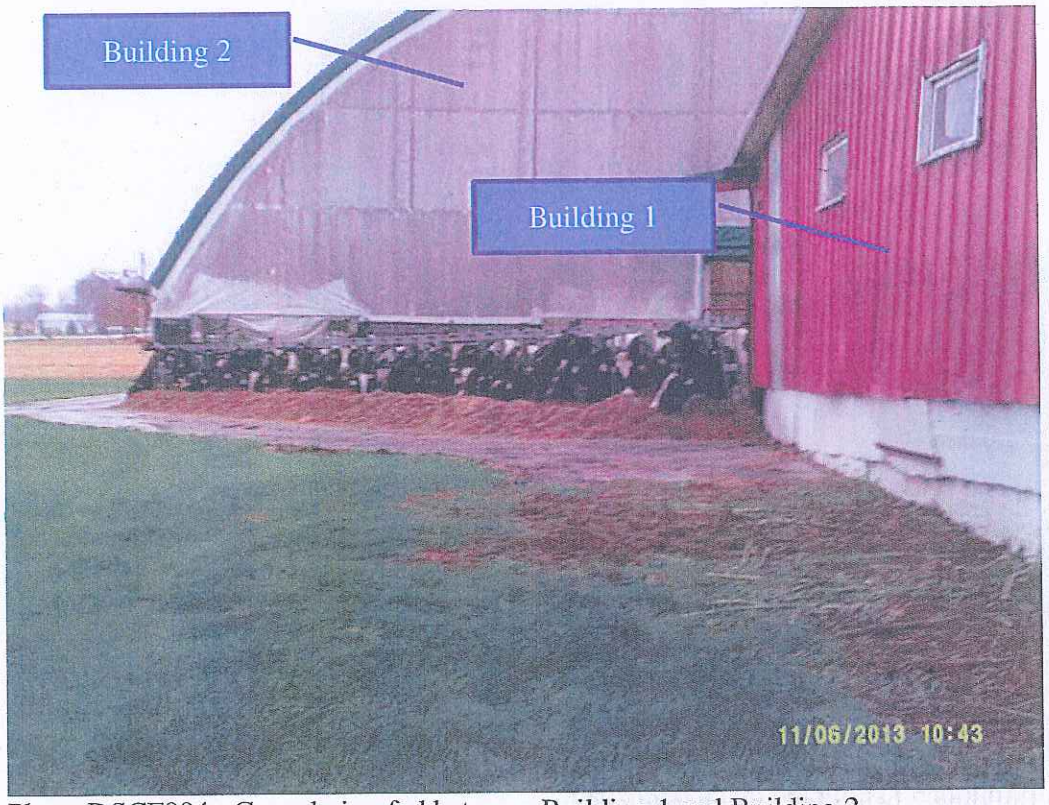


Photo DSCF004: Cows being fed between Building 1 and Building 2
Date/Time: 11/6/2013 10:43 A.M Location: East Side of Building 1. Facing: South

The inspectors observed a concrete pad along the east side of Building 2 used to feed the animals confined in Building 2. The pad was generally clean on the day of the inspection and the feed was mostly under the overhang of Building 2. EPA observed some precipitation falling on the concrete pad mingling with the feed on the pad resulting in runoff flowing to the unnamed tributary. The flow of potentially contaminated runoff from the concrete pad flowed across the south access road and formed a slight channel as it flowed into the unnamed tributary (pathway 1).

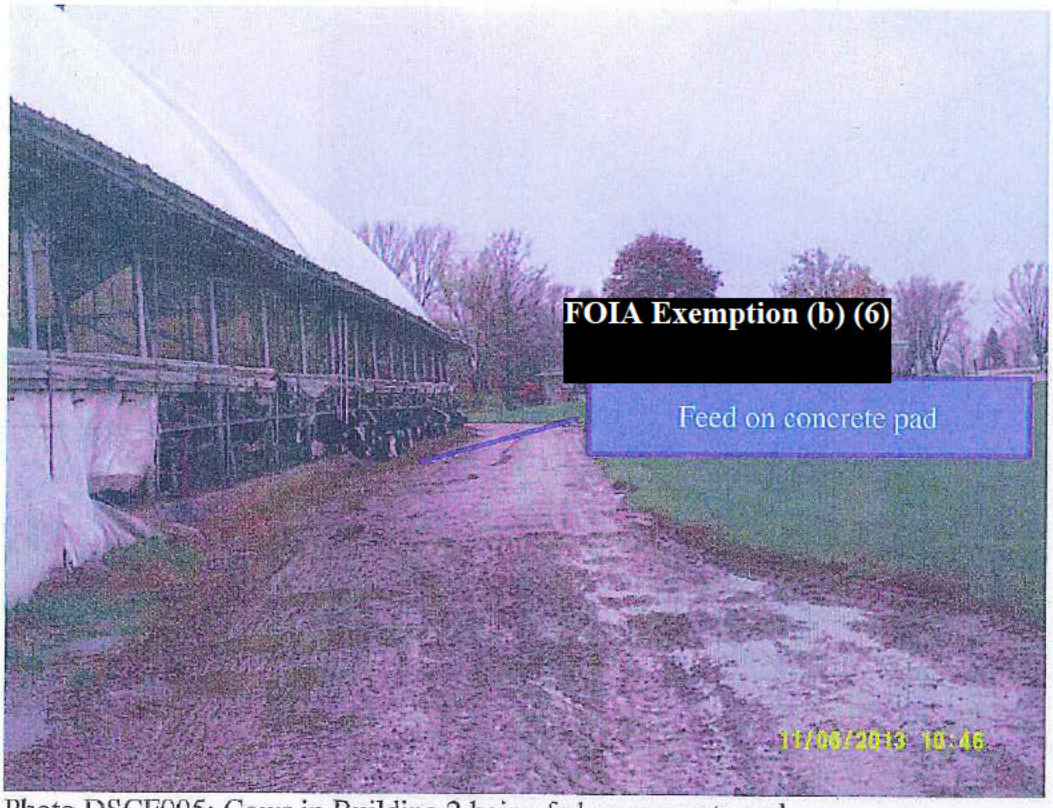


Photo DSCF005: Cows in Building 2 being fed on concrete pad.
Date/Time: 11/6/2013 10:46 A.M. Location: Southeast corner of Building 2 Facing: North

Photo DSCF0007: South side of Barn 2. South access road with Feed Bunker and Feed Mound 1 visible.
Date/Time: 11/6/2013 10:46 A.M. Location: Southeast corner of Building 2 Facing: West

Photo DSCF008: Flow from concrete pad on east side of Building 2, flowing into unnamed tributary. Date/Time: 11/6/2013 10:47 A.M. Location: Southeast corner of Building 2. Facing: South

The inspection proceeded west on the south side of Building 2. EPA observed the manure transfer pit into which manure is pushed from Building 2. At the time of inspection, a tractor was hooked to a pump in the transfer pit. This pump, when active, pumps manure from the transfer pit to the manure storage pit. The back side of the manure storage pit was visible immediately north of the transfer pit. Precipitation runoff from the transfer pit pump area where the tractor was parked and surrounding access road was noted flowing south across the south access road toward the unnamed tributary.

PhotoDSCF009: Manure transfer pit and top of manure storage pit in background.
Date/Time: 11/6/2013 10:48 A.M. Location: Southwest corner of Building 2 Facing: North

Photo: DSCF0010 – Transfer Pit manure pushed in from Building 2 into the transfer pit
Date/Time: 11/6/2013 10:48 A.M. Location: Southwest corner of Building 2 Facing: North

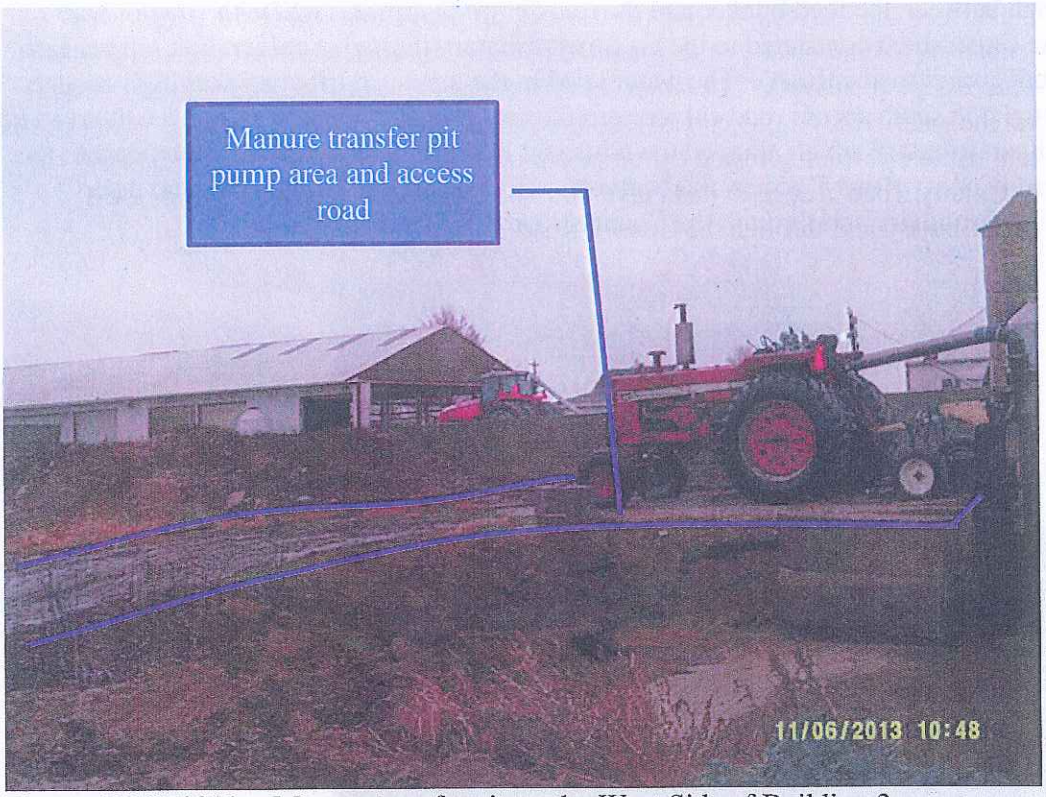


Photo: DSCF0011- Manure transfer pit on the West Side of Building 2
Date/Time: 11/6/2013 10:48 A.M. Location: Southwest corner of Building 2 Facing: Northwest

Photo: DSCF0012 – Precipitation runoff from manure transfer pit pump area and access road flowing on south access road toward unnamed tributary
Date/time: 11/6/2013 10:49 A.M. Location: Southwest corner of Building 2 Facing: Southwest

The inspectors noted a ditch between the feed bunker and the transfer pit pump area where the tractor was parked (center ditch). The center ditch connected to the unnamed tributary through a culvert that ran beneath the south access road (south access road culvert). The water level in the unnamed tributary was high enough that it had backed up through the south access road culvert into the center ditch. There was also a culvert in line with the unnamed intermittent tributary which allowed the unnamed intermittent tributary to flow beneath the County Road T access road (County Road T access road culvert). The inspectors checked for and noted flowing water in the unnamed tributary and through the County Road T access road culvert.

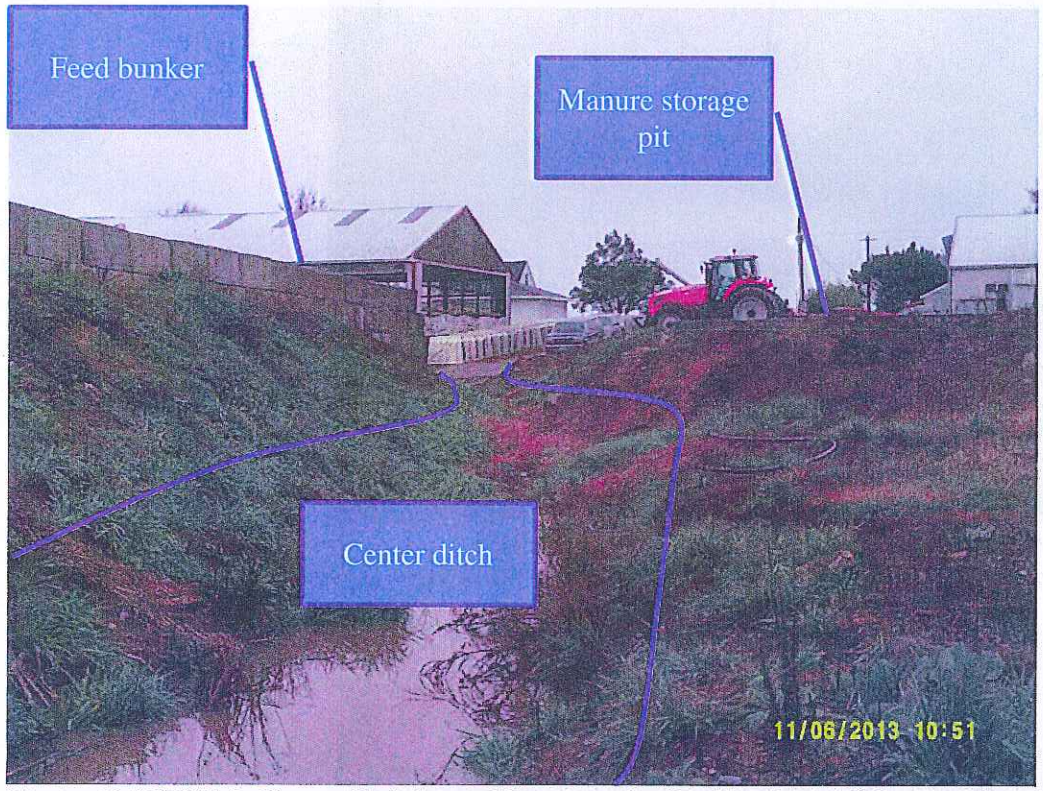


Photo: DSCF0013: Center ditch located between the feed bunker and the transfer pit pump area.
Date/Time: 11/6/2013 10:51 A.M. Location: Southeast of feed bunker. Facing: North

Photo: DSCF0014: North end of south access road culvert connecting ditch located between manure transfer pit pump area and the feed bunker to the unnamed intermittent tributary.
Date/Time: 11/6/2013 10:51 A.M. Location: North side of south access road culvert. Facing: Down

Photo: DSCF0015: South end of south access road culvert connecting ditch located between manure transfer pit pump area and the feed bunker to the unnamed intermittent tributary.
Date/Time: 11/6/2013 10:51 A.M. Location: South side of south access road culvert. Facing: Down

Photo DCSF 0016: Water in unnamed intermittent tributary.
Date/Time: 11/6/2013 10:52 A.M. Location: South of south access road between Building 2 and feed bunker
Facing: South

Photo DSCF0017: East side (upstream) of County Road T access road culvert.
Date/Time: 11/6/2013 10:52 A.M. Location: East side of County Road T access road culvert. Facing: Down

Photo DSCF0018: West side (downstream) of County Road T access road culvert.
Date/Time: 11/6/2013 10:52 A.M. Location: West side of County Road T access road culvert. Facing: Down

The Inspectors continued west along the south side of the facility. The inspectors noted the flow of water in the unnamed intermittent tributary. There was what appeared to be a black residue on the vegetation and ground along the edge of the unnamed intermittent tributary. The slope of the ground and flow of surface water around the facility is towards the unnamed intermittent tributary

Photo 0019: South end of center ditch and edge of feed bunker on the south access road.
Date/Time: 11/6/2013 10:54 A.M. Location: South access road west of center ditch Facing: East

DSCF0020: Black residue on the ground and vegetation along the unnamed intermittent tributary.
Date/Time: 11/6/2013 10:55 A.M. Location: South of feed bunker. Facing: South

DSCF0021: Water in unnamed intermittent tributary. Direction of flow indicated by blue arrow.
Date/Time: 11/6/2013 10:56 A.M. Location: West of center ditch and south of feed bunker.
Facing: Southeast

Photo DSCF0022: Water in unnamed intermittent tributary. Direction of flow indicated by blue arrow.
Date/Time: 11/6/2013 10:56 A.M. Location: West of center ditch and south of feed bunker
Facing: Southeast

The Inspectors continued west along the south side of the facility. It was noted that the feed in the feed bunker extended beyond the edge of the feed bunker. Loose feed was also seen beyond the edge of the plastic covering the feed in the bunker. Precipitation and surface runoff were mingling with this loose feed.

Photo: DCSF0023: South edge of feed bunker.
Date/Time: 11/6/2013 10:57 A.M. Location: Southwest corner of feed bunker. Facing: East

The inspectors continued around the southern edge of the facility. Three white plastic covered mounds of feed were located west of the feed bunker. Two additional piles of non-covered feed were also present west of the feed bunker. Ex. 6 (Personal Privacy) stated that the non-covered feed piles were haylage. Dark colored leachate, surface runoff, and feed debris from the non-covered feed piles, the base of the covered feed mounds, and spilled loose feed were observed. In addition to the surface runoff flowing directly into the unnamed intermittent tributary the inspectors found two channels through which the leachate, surface runoff, and feed debris were flowing to the unnamed intermittent tributary. The first of these channels was located west between covered feed mounds 1 and 2 (pathway 2). Pathway 2 is the sampling location for sample S02.

Photo DSCF0024: Darkly colored leachate and runoff surrounding the base of covered feed mound 1 and non-covered feed mound 1.
Date/Time: 11/6/2013 10:59 A.M. Location: Southwestern corner of facility. Facing: North

Photo DSCF0068: Flow of leachate and surface runoff from between covered feed mounds 1 and 2 west to unnamed intermittent tributary
Date/Time: 11/6/2013 12:02 P.M. Location: West side of facility between covered feed mounds 1 and 2
Facing: East

DSCF0052: Surface runoff mixing with loose feed and leachate and flowing between covered feed mounds 1 and 2 to pathway 2.
Date/Time: 11/6 2013 11:21 A.M. Location: East end of covered feed mound 1 and 2. Facing: West

Photo DSCF0054: Surface runoff mixing with loose feed and leachate and flowing between covered feed mounds 1 and 2 to pathway 2.
Date/Time: 11/6 2013 11:22 A.M. Location: Between covered feed mound 1 and 2. Facing: West

Photo DSCF0069: Flow of runoff through pathway 2 to unnamed intermittent tributary.
Date/Time: 11/6/2013 12:02 P.M. Location: West side of facility between covered feed mounds 1 and 2.
Facing: Northwest

PhotoDSCF0070: Pathway 2 and sample S02.
Date/Time: 11/6/2013 12:06 P.M. Location: West side of facility between covered feed mounds 1 and 2.
Facing: Northwest

The second channel was located west between covered feed mounds 2 and 3 (pathway 3). Pathway 3 was also observed to be transporting leachate, surface runoff, and feed debris from between covered feed mounds 2 and 3 and surrounding areas to the unnamed intermittent tributary. Pathway 3 is sampling location for sample S03.

Photo DSCF0078: Pathway 3 conveying runoff, leachate, and feed debris to unnamed intermittent tributary. Date/Time: 11/6/2013 12:23 P.M. Location: West side of facility between covered feed mound 2 and 3. Facing: Northeast

Photo DSCF0034: Surface runoff loose feed and leachate and flowing between covered feed mounds 2 and 3 to pathway 3.
Date/Time: 11/6/2013 11:06 A.M. Location: West of covered feed mound 2 and 3. Facing: East

DSCF0032: Surface runoff mixing with loose feed and leachate and flowing between covered feed mounds 2 and 3 to pathway 3.
Date/Time: 11/6/2013 11:06 A.M. Location: West side of facility between covered feed mound 2 and 3.
Facing: South

Photo DSCF0033: Pathway 3 conveying runoff, leachate, and feed debris to unnamed intermittent tributary.
Date/Time: 11/6/2013 11:06 A.M. Location: West side of facility between covered feed mound 2 and 3.
Facing: Southwest

Photo DSCF0035: Pathway 3 conveying runoff, leachate, and feed debris to unnamed intermittent tributary.
Date/Time: 11/6/2013 11:06 A.M. Location: West side of facility between covered feed mound 2 and 3.
Facing: West

Photo DSCF0031: Pathway 3 conveying runoff, leachate, and feed debris to unnamed intermittent tributary.
Date/Time: 11/6/2013 11:05 A.M. Location: West side of covered feed mound 2 and 3. Facing: Northwest

Photo DSCF0030: Pathway 3 conveying runoff, leachate, and feed debris to unnamed intermittent tributary.
Red arrow indicating pathway 2 and blue arrow indicating flow direction of unnamed intermittent tributary.
Date/Time: 11/6/2013 11:05 A.M. Location: West side of covered feed mound 2 and 3. Facing: Northwest

Photo DSCF0036: Unnamed intermittent tributary flowing to the northwest.
Date/Time: 11/6/2013 11:09 A.M. Location: West side of facility. Facing: Northwest

The inspectors continued walking along the west side of the facility. Surface runoff from the north access road was seen to be flowing west and mixing with leachate and feed debris from covered feed mound 3, non-covered feed mound 2, and loose feed on the ground. This runoff flowed west around parked trucks and machinery towards the unnamed intermittent tributary.

Photo DSCF0037: Surface runoff flowing west through loose feed and leachate toward unnamed intermittent tributary.
Date/Time: 11/6/2013 11:11 A.M. Location: West of Building 3 Facing:Southeast

Photo DSCF0038: Surface runoff flowing west through loose feed and leachate toward unnamed intermittent tributary.
Date/Time: 11/6/2013 11:11 A.M. Location: Southwest of Building 3. Facing: Southeast

Photo DSCF0039: Surface runoff flowing west around parked trucks/machinery toward unnamed intermittent tributary.
Date/Time: 11/6/2013 11:11 A.M. Location: West of Building 3. Facing: West

The inspectors continued north and then east to inspect behind Building 3. The inspectors noted surface runoff coming in contact with feed and bedding from Building 3. They also noted the presence of flowing water within the intermittent tributary and the direction of flow.

Photo DSCF0040: Building 3 used for machine storage and heifers.
Date/Time: 11/6/2013 11:11 A.M. Location: West of Building 3Facing: East

Photo DSCF0041: Feed and bedding coming into contact with surface runoff.
Date/Time: 11/6/2013 11:12 A.M. Location: West side Building 3. Facing: East

Photo DSCF0042: Unnamed intermittent tributary flowing to the North.
Date/Time: 11/6/2013 11:12 A.M. Location: West of parked trucks and machinery. Facing: North

Photo DSCF0043: Water in the unnamed intermittent tributary.
Date/Time: 11/6/2013 11:14 A.M. Location: Northwest corner of facility. Facing: Northwest

The inspectors walked the ditch on the facility's northern side and noted multiple pipes and a culvert that exited into the ditch (north ditch). The operator stated that he did not know the source of the pipes and that he believed they came from the adjacent land owners property.

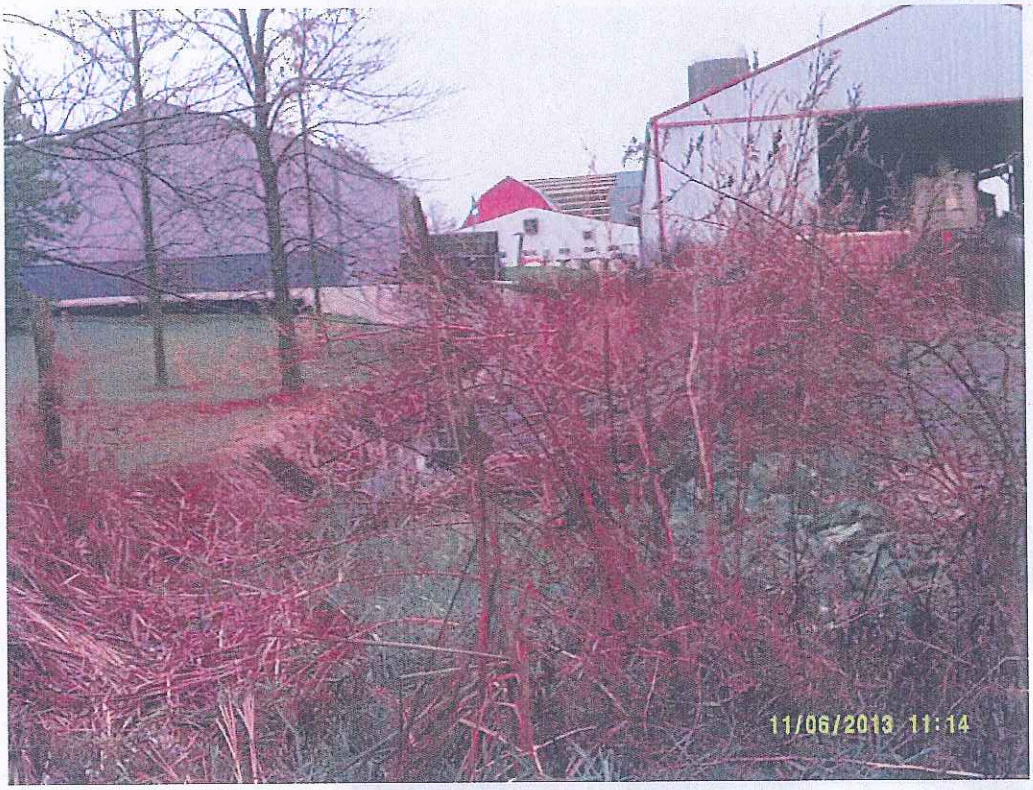


Photo DSCF0044: North ditch.
Date/Time: 11/6/2013 11:14 A.M. Location: West of Building 3. Facing: East

Photo DSCF0045: Flowing water in unnamed intermittent tributary.
Date/Time: 11/6/2013 11:14 A.M. Location: Northwest corner of facility. Facing: West

Photo DSCF0046: North ditch on northwest side of the facility.
Date/Time: 11/6/2013 11:16 A.M. Location: northwest of Building 3. Facing: Northeast

Photo DSCF0047: Culvert within the north ditch.
Date/Time: 11/6/2013 11:16 A.M. Location: Northwest Building 3. Facing: Northeast

The inspectors walked east on the north access road between covered feed mound 3 and Building 3. The inspectors turned south and walked between the covered feed mounds and the feed bunker. The ground surface of the facility appeared to be a patchwork of concrete, blacktop, and gravel. A stack of baled compost material used for bedding was seen north of covered feed mound 3. The inspectors walked south between the feed bunker and covered mounds and noted the surface runoff flowing west between the covered feed mounds. This runoff was seen to be flowing through loose feed, leachate, and feed debris and flowing to pathways 2 and 3 to the unnamed intermittent tributary.

Photo DSCF0048: South of Building 3.
Date/Time: 11/6/2013 11:18 A.M. Location: North access road south of Building 3. Facing: West

Photo DSCF0049: Compost material and feed bunker.
Date/Time: 11/6/2013 11:18 A.M. Location: Northwest of feed bunker. Facing: South

DSCF0050: Surface runoff mixing with loose feed and leachate and flowing between covered feed mounds 2 and 3 to pathway 3.
Date/Time: 11/6 2013 11:19 A.M. Location: East of covered feed mounds 2 and 3. Facing: West

DSCF0051: Surface runoff mixing with loose feed and leachate and flowing between covered feed mounds 2 and 3 to pathway 3.
Date/Time: 11/6 2013 11:19 A.M. Location: East of covered feed mounds 2 and 3. Facing: West

DSCF0052: Surface runoff mixing with loose feed and leachate and flowing between covered feed mounds 1 and 2 to pathway 2.
Date/Time: 11/6 2013 11:21 A.M. Location: East between covered feed mound 1and 2. Facing: West

DSCF0053: Surface runoff mixing with loose feed and leachate and flowing between covered feed mounds 1 and 2 to pathway 2.
Date/Time: 11/6 2013 11:21 A.M. Location: East between covered feed mound 1and 2. Facing: West

Photo DSCF0054: Surface runoff mixing with loose feed and leachate and flowing between covered feed mounds 1 and 2 to pathway 2.
Date/Time: 11/6 2013 11:22 A.M. Location: East between covered feed mound 1and 2. Facing: West

Then inspectors then walked back north to the north access road and walked east toward Building 1. The inspectors noted surface runoff flowing around the calf hutches located north of the feed bunker. Surface runoff was also seen flowing from around the calf hutches on the east side of Building 3. The inspectors also saw surface runoff flowing through the feed extending beyond the front edge of the feed bunker. The runoff seen flowing from around the two calf hutch areas and from around the front of the feed bunker was observed flowing to the north end of center ditch.

Photo DSCF0055: Surface runoff flowing around calf hutches and feed bunker flowing to center ditch.
Date/Time: 11/6/2013 11:24 A.M. Location: North end of center ditch. Facing: South

Photo DSCF0056: Calf hutches and feed bunker.
Date/Time: 11/6/2013 11:24 A.M. Location: North of center ditch. Facing: Southwest

Photo DSCF0057: Feed bunker, covered feed mounds, and compost bales.
Date/Time: 11/6/2013 11:24 A.M. Location: North of center ditch. Facing: Southwest

Photo DSCF0058: Heifers in Building 3 and calf hutches east of Building 3.
Date/Time: 11/6/2013 11:24 A.M. Location: Southeast corner of Building 3. Facing: North

Photo DSCF0059: Calf hutches east of Building 3.
Date/Time: 11/6 /2013 11:25 A.M. Location: Southeast corner of Building 3. Facing: Northeast

The inspectors continued east toward Building 1. The manure storage pit had earth mounded around the concrete walls. The pit was not overflowing at the time of the inspection. There appeared to be less than one foot of freeboard. There was either manure or soil noted on the top of the manure storage structure walls. The inspectors then returned to the beginning point of the inspection.

Photo DSCF0060: Northwest corner of the manure storage pit.
Date/Time: 11/6/2013 11:25 A.M. Location: Northwest corner of the manure storage pit. Facing: East

Photo DSCF0062: Manure storage pit.
Date/Time: 11/6/2013 11:26 A.M. Location: North of the manure storage pit. Facing: South

Photo DSCF0063: Levels within the Manure Storage Structure
Date/Time: 11/6/2013 11:26 A.M. Location: Northwest corner of the manure storage pit. Facing: Southeast

Photo DSCF0064: Clearer picture of the levels within the manure storage pit.
Date/Time: 11/6/2013 11:26 A.M. Location: Northwest Corner of the manure storage pit. Facing: Southeast

Upon returning to their starting point, the inspectors took a moment to confer with one another and decided upon the sampling locations. The inspectors informed the operator that they would collect samples from three locations and offered to split samples with the operator. The operator stated that he would like to have split samples. The inspectors then proceeded to take samples from three locations and documented the presence or flow of water within the unnamed intermittent tributary, center ditch, and pathways 2 and 3.

Photo DSCF0065: Sample S01 – "Ditch 1".
Date/Time: 11/6/2013 11:59 Location: North side of the south access road, south end of center ditch.
Facing: Down

Photo DSCF0066: Close-up of sample S01 – for Nutrients
Date/Time: 11/6 /2013 11:52 A.M. Location: North side of the south access road, south end of center ditch.
Facing: Close up

Photo DSCF0067: Photo of the where samples S01 were collected in Center Ditch
Date/Time: 11/6/2013 11:52 A.M. Location: North side of the south access road, south end of center ditch.
Facing: North

Photo DSCF0068: Flow of leachate and surface runoff from between covered feed mounds 1 and 2 west to unnamed intermittent tributary.
Date/Time: 11/6/2013 12:02 P.M. Location: West side of facility between covered feed mounds 1 and 2.
Facing: East

Photo DSCF0069: Flow of runoff through pathway 2 to unnamed intermittent tributary.
Date/Time: 11/6/2013 12:02 P.M. Location: West side of facility between covered feed mounds 1 and 2.

Facing: Northwest

PhotoDSCF0070: Pathway 2 and sample S02.
Date/Time: 11/6/2013 12:06 P.M. Location: West side of facility between covered feed mounds 1 and 2.
Facing: Northwest

Photo DSCF0071: Sample S02.
Date/Time: 11/6/2013 12:06 P.M. Location: West side of facility between covered feed mounds 1 and 2.
Facing: Down

Photo DSCF0072: Pathway 2 and sample S02.
Date/Time: 11/6/2013 12:06 A.M. Location: West side of facility between covered feed mounds 1 and 2.
Facing: Northwest

Photo DSCF0073: Pathway 2 flowing into intermittent unnamed tributary.
Date/Time: 11/6/2013 12:06 P.M. Location: West side of facility between covered feed mounds 1 and 2.
Facing: Southwest

Photo DSCF0074: Water within the intermittent unnamed tributary.
Date/Time: 11/6/2013 12:08 P.M. Location: West edge of facility. Facing: West.

Photo DSCF0075: Water within the intermittent unnamed tributary.
Date/Time: 11/6/2013 12:08 P.M. Location: West edge of facility. Facing: West.

Photo DSCF0076: Water within intermittent unnamed tributary.
Date/Time: 11/6/2013 12:09 P.M. Location: West edge of facility. Facing: West.

Photo DSCF0077: Intermittent unnamed tributary.
Date/Time: 11/6/2012 12:09 P.M. Location: West side of facility Facing: Northwest

Photo DSCF0078: Flow of runoff, leachate, and feed debris to pathway 3.
Date/Time: 11/6/2013 12:23 P.M. Location: West between covered feed mounds 2 and 3. Facing: East

Photo DSCF0079: Sample S03 – West side of the facility.
Date/Time: 11/6/2013 12:23 P.M. Location: West between covered feed mounds 2 and 3. Facing: West

PhotoDSCF0080: Sample S03 and pathway 3.
Date/Time: 11/6/2012 12:23 P.M. Location: West between covered feed mounds 2 and 3. Facing: Southwest

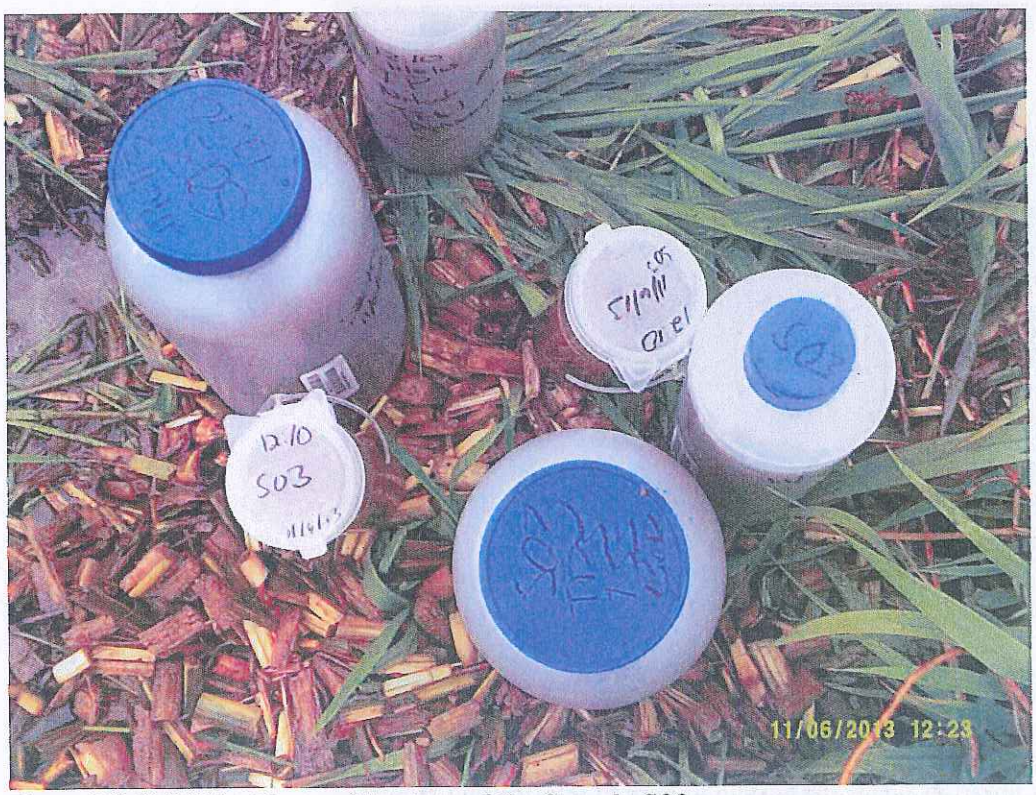


Photo DSCF0081: Photo of the tops of the Sample S03.
Date/Time: 11/6/2013 12:23 P.M. Location: West between covered feed mounds 2 and 3. Facing: Down

Photo DSCF0082: Blurred photo of water within the unnamed intermittent tributary.
Date/Time: 11/6/2013 12:24 P.M. Location: West side of the Production Area. Facing: Northwest.

Photo DSCF0083: Blurred photo of water within the unnamed intermittent tributary.
Date/Time: 11/6/2013 12:24 P.M. Location: West side of the Production Area. Facing: Northwest.

DSCF0084: Blurred photo of water within the unnamed intermittent tributary.
Date/Time: 11/6/2013 12:24 P.M. Location: West side of the Production Area. Facing: West.

Photo DSCF0085: Water within the unnamed intermittent tributary.
Date/Time: 11/6/2013 12:24 P.M. Location: West side of the Production Area. Facing: West.

The inspectors preserved the samples and gave the operator his split samples. The inspectors conducted a closing conference in which compliance assistance materials were given to the operator and potential violation and areas of concern were identified. The inspectors exited the site at approximately 12:45 P.M. The Fecal Coliform, Biochemical Oxygen Demand, Total Dissolved Solids and Total Suspended Solids samples were placed in a cooler with ice and driven to Pace Analytical Labs in Green Bay, Wisconsin. They were hand delivered at 2:20 P.M. The Total Kjeldahl Nitrogen (TKN), Total Phosphorus, Ammonia Nitrogen, and Nitrate-Nitrite (N-N) samples were kept on ice and hand delivered to the EPA Region 5 Chicago Regional Laboratory on November 7, 2013 at 10:00 A.M.

2.3 Closing Conference and Post-Inspection

Table 11: Post Walk-Through

Were specific "Potential Violations" discussed with facility personnel?	Yes
Were specific "Areas of Concern" discussed with facility personnel?	Yes
Who were the Potential Violations or Areas of Concern discussed with? The potential violations and areas of concern were discussed with the operator and his consultant.	
Compliance assistance materials given to facility personnel: • EPA's CAFO Final Rulemaking – Fact Sheet • NRCS EQIP program brochure • EPA's Small Business Resources Information Sheet • NRCS's Most Common Conservation Practices for Confined Livestock brochure	
Exit Time:	**12:45 P.M.**
Disposable Boots Left at Facility?	Yes
Vehicle Washed after leaving facility?	Yes

Table 12: Waterway Documentation

List the pathway taken by EPA inspectors to document the waterway at the facility.
See attached waterway flow documentation

Table 13a: Sampling Information

Were samples taken?	Yes
Were samples split with facility?	Yes
Number of samples taken?	3 + trip blank
Was a trip blank created (done prior to entering the facility)?	A blank was done at the facility.
Identify which sample is the trip blank.	B01
Were field duplicate samples taken (1 duplicate per 20 samples)?	No
Identify which sample(s) is/are the field duplicate(s)	NA
Were equipment blanks taken (if more than one type of equipment was used to collect samples)?	No
Identify which samples were equipment blanks.	NA
List chain of custody for fecal coliform samples:	B.A. to Pace
List chain of custody for nutrient and general chemistry samples:	B.A. to Region 5 Lab
Location where samples were preserved:	At the Facility
Name of people involved with sample preservation:	Ben Atkinson and Cheryl Burdett
Time of sample preservation:	12:30 P.M.
Were samples shipped to a lab?	No.
Weather conditions at the time of sample collection:	Overcast

Table 14b: Facility Sample Information

Number	Name	Location	Date	Time	Collector	Photo #	Photographer	Method of Collection	# of Sulfuric Acid Ampoules
S01	Ditch 1	Ditch between silage bunker and manure pit	11/6/2013	11:43	BA, CB	DSCF0065 - DSCF0067	CB	Grab	1
S02	South of Silage	South west corner of facility	11/6/2013	11:56	BA, CB	DSCF0068- DSCF0072	CB	Grab	4
S03	Sample 3	West side of facility	11/6/2013	12:10	BA, CB	DSCF0078 - DSCF0085	CB	Grab	1
B01	Goral Farms	Blank	11/6/2013	12:30	BA, CB				1

Table 15: Sample Results

Sample ID	Sample Description (all liquid samples unless otherwise noted)	Biochemical Oxygen Demand (mg/L)	Total Kjeldahl Nitrogen (mg/L)	Nitrate-Nitrite N (mg/L)	Ammonia as N (mg/L)	Total Phosphorus (mg/L)	Total Dissolved Solids (mg/L)	Total Suspended Solids (mg/L)	Fecal Coliform (CFU/100ml)
	Typical limits			*0.1* *	*15*	*.05***	*1000*		*200*
S01	Ditch 1	680	39.8	5.71	7.41	13.9	1080	279	460000
S02	South of Silage	9300	866	4.33	185	96.5	12600	132	20000000
S03	S03	2200	308	1.5	10.8	38.6	2160	386	4600000
B01	Blank	3	U	U	.04	U	U	U	NA

U = Not Detected

In Wisconsin, there are no Water Quality Standards for Biochemical Oxygen Demand, Total Kjeldahl Nitrogen, Nitrate-Nitrite, Ammonia as Nitrogen, Total Dissolved Solids and Total Suspended Solids but a limit for Nitrate-Nitrite is provided and is meant to be a benchmark for comparison only.

* Maximum Nitrate-Nitrite amount for aquatic life (North Carolina State University Water Quality Group)
**Maximum Total Phosphorus limit for all other unidirectional streams/rivers not listed in Chapter NR 102.6 (3) (a) of Wisconsin Administrative Code.
***Although there are no effluent limits for CAFOs, the limit in Wisconsin for Fecal Coliform in a stream for general use is 200 colonies/100ml. (Chapter NR 102, Water Quality Standards for Wisconsin Surface Waters, November 2010 of the Wisconsin Administrative Code.)

- The Fecal Coliform results were analyzed by Pace Analytical Labs located at 1241 Bellevue St #9 Green Bay, WI 54302-2156
- Ammonia Nitrogen, Total Phosphorus, Nitrate-Nitrite, Dissolved Solids (TDS), Total Suspended Solids (TSS), Total Kjeldahl Nitrogen (TKN), and Biochemical Oxygen Demand (BOD) were analyzed by the Region 5 Chicago Regional Laboratory.

3. POTENTIAL VIOLATIONS

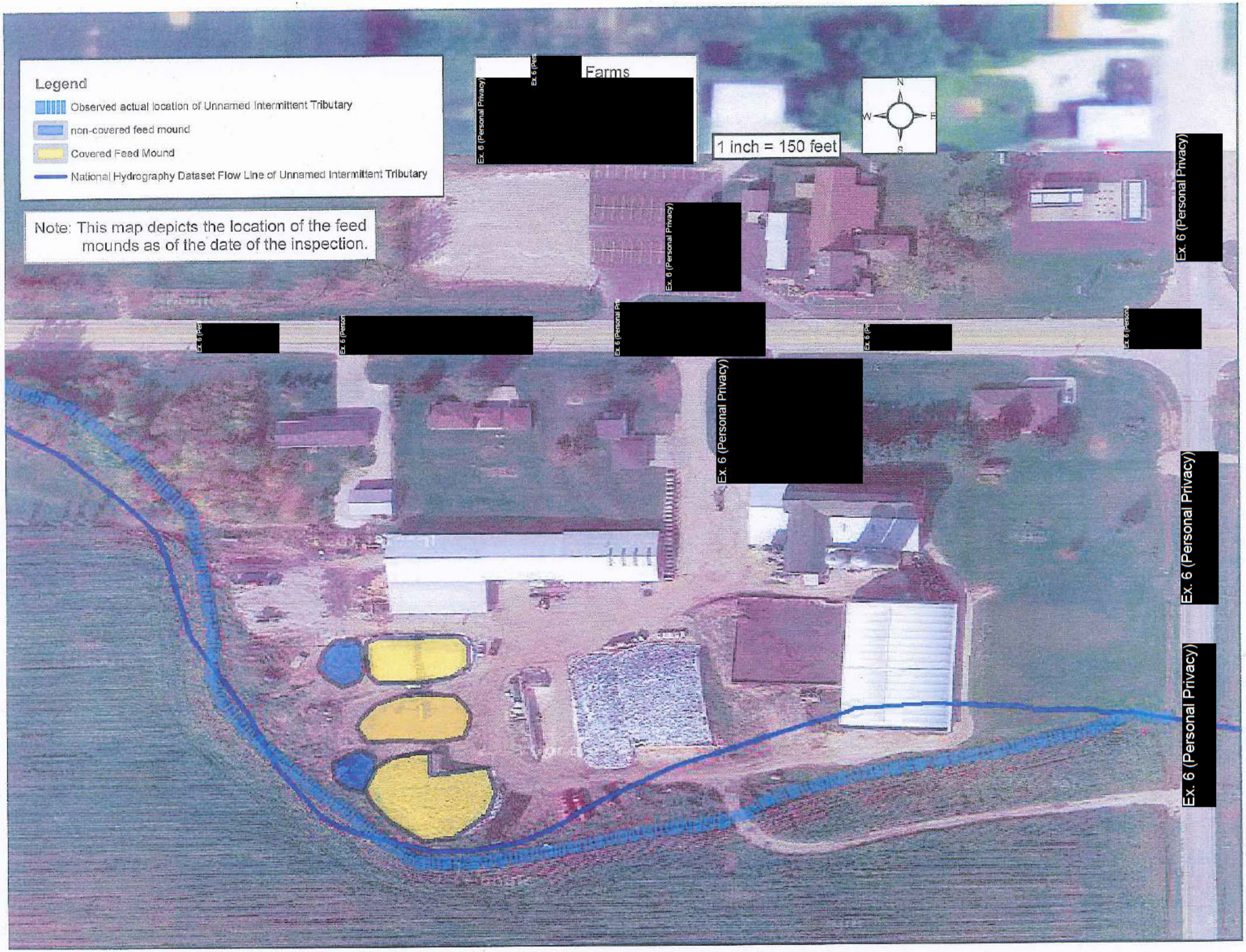
According to Section 301(a) of the Clean Water Act, it is a violation to discharge pollutants from a CAFO to waters of the United States without a permit. EPA observed potential discharges in the following locations:

1. Southeast of Building 1, contaminated runoff from the concrete pad discharged to the unnamed intermittent tributary through pathway 1.
2. Contaminated runoff flowed to the center ditch between the feed bunker and manure storage pit and discharged to the unnamed intermittent tributary.
3. Contaminated runoff discharged to the unnamed intermittent tributary through pathway 2 on the southwest portion of the faculty.
4. Contaminated runoff discharged to the unnamed intermittent tributary through pathway 3 on the western portion of the faculty.

4. LIST OF ATTACHMENTS

A) Aerial photographs of the operation with Buildings, waterways and discharge pathways labeled.
B) Waterway determination
C) Sample Results

Attachment A: Aerial photographs of the operation with buildings, waterways and discharge pathways labeled.


Legend
Observed actual location of Unnamed Intermittent Tributary
non-covered feed mound
Covered Feed Mound
National Hydrography Dataset Flow Line of Unnamed Intermittent Tributary
Note: This map depicts the location of the feed mounds as of the date of the inspection.
Farms
1 inch = 150 feet
N
W
E
S
Ex. 6 (Personal Privacy)